

United States Bankruptcy Court for the:

District of South Carolina

Case number (if known): \_\_\_\_\_

Chapter you are filing under:

- ☐ Chapter 7  
☒ Chapter 11  
☐ Chapter 12  
☐ Chapter 13

☐ Check if this is an  
amended filing

## Official Form 201

## Voluntary Petition for Non-Individuals Filing for Bankruptcy

04/20

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name Kismet Rock Hill, LLC

2. All other names debtor used  
in the last 8 years

Holiday Inn Rock Hill

Include any assumed names,  
trade names, and *doing business*  
as names

3. Debtor's federal Employer  
Identification Number (EIN)

26-1224249

4. Debtor's address

Principal place of business

Mailing address, if different from principal place  
of business

503 Galleria Blvd.

Number Street

Number Street

Rock Hill SC 29730

City State ZIP Code

P.O. Box

City State ZIP Code

York County

County

Location of principal assets, if different from  
principal place of business

Number Street

City State ZIP Code

5. Debtor's website (URL)

N/A

6. Type of debtor

- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))  
☐ Partnership (excluding LLP)  
☐ Other. Specify: \_\_\_\_\_

Debtor Kismet Rock Hill, LLC Case number (if known) \_\_\_\_\_  
Name

**7. Describe debtor's business**

A. Check one:

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))  
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))  
☐ Railroad (as defined in 11 U.S.C. § 101(44))  
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))  
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))  
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))  
☒ None of the above

B. Check all that apply:

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)  
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)  
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.

See <http://www.naics.com/search/>.

7211

**8. Under which chapter of the Bankruptcy Code is the debtor filing?**

Check one:

- ☐ Chapter 7  
☐ Chapter 9  
☒ Chapter 11. Check all that apply:

A debtor who is a "small business debtor" must check the first sub-box. A debtor as defined in § 1182(1) who elects to proceed under subchapter V of chapter 11 (whether or not the debtor is a "small business debtor") must check the second sub-box.

- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,725,625. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).  
☐ The debtor is a debtor as defined in 11 U.S.C. § 1182(1), its aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$7,500,000, **and it chooses to proceed under Subchapter V of Chapter 11**. If this sub-box is selected, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return, or if any of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).  
☐ A plan is being filed with this petition.  
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).  
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.  
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12

**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

☒ No

☐ Yes. District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_  
MM / DD / YYYY  
 District \_\_\_\_\_ When \_\_\_\_\_ Case number \_\_\_\_\_  
MM / DD / YYYY

If more than 2 cases, attach a separate list.

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**

☒ No

☐ Yes. Debtor \_\_\_\_\_ Relationship \_\_\_\_\_  
 District \_\_\_\_\_ When \_\_\_\_\_  
 Case number, if known \_\_\_\_\_  
 MM / DD / YYYY

List all cases. If more than 1, attach a separate list.

Debtor Kismet Rock Hill, LLC Case number (if known) \_\_\_\_\_  
Name

**11. Why is the case filed in *this* district?**

*Check all that apply:*

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**

- ☒ No
- ☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.

**Why does the property need immediate attention?** *(Check all that apply.)*

- ☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.  
What is the hazard? \_\_\_\_\_
- ☐ It needs to be physically secured or protected from the weather.
- ☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).
- ☐ Other \_\_\_\_\_

**Where is the property?** \_\_\_\_\_

Number Street  
\_\_\_\_\_  
City State ZIP Code

**Is the property insured?**

- ☐ No
- ☐ Yes. Insurance agency \_\_\_\_\_  
Contact name \_\_\_\_\_  
Phone \_\_\_\_\_

**Statistical and administrative information**

**13. Debtor's estimation of available funds**

*Check one:*

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

**14. Estimated number of creditors**

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> 1-49 | <input type="checkbox"/> 1,000-5,000   | <input type="checkbox"/> 25,001-50,000     |
| <input type="checkbox"/> 50-99           | <input type="checkbox"/> 5,001-10,000  | <input type="checkbox"/> 50,001-100,000    |
| <input type="checkbox"/> 100-199         | <input type="checkbox"/> 10,001-25,000 | <input type="checkbox"/> More than 100,000 |
| <input type="checkbox"/> 200-999         |  |  |

**15. Estimated assets**

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> \$0-\$50,000          | <input type="checkbox"/> \$1,000,001-\$10 million             | <input type="checkbox"/> \$500,000,001-\$1 billion     |
| <input type="checkbox"/> \$50,001-\$100,000    | <input checked="" type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion  |
| <input type="checkbox"/> \$100,001-\$500,000   | <input type="checkbox"/> \$50,000,001-\$100 million           | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million          | <input type="checkbox"/> More than \$50 billion        |

Debtor Kismet Rock Hill, LLC  
Name

Case number (if known)

16. Estimated liabilities

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> \$0-\$50,000          | <input checked="" type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion     |
| <input type="checkbox"/> \$50,001-\$100,000    | <input type="checkbox"/> \$10,000,001-\$50 million           | <input type="checkbox"/> \$1,000,000,001-\$10 billion  |
| <input type="checkbox"/> \$100,001-\$500,000   | <input type="checkbox"/> \$50,000,001-\$100 million          | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input type="checkbox"/> \$100,000,001-\$500 million         | <input type="checkbox"/> More than \$50 billion        |

Request for Relief, Declaration, and Signatures

**WARNING --** Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 07/23/2021  
MM / DD / YYYY

X /s/ Kartar Singh

Signature of authorized representative of debtor

Kartar Singh

Printed name

Title Manager

18. Signature of attorney

X /s/ Christine E. Brimm

Signature of attorney for debtor

Date 07/23/2021

MM / DD / YYYY

Christine E. Brimm

Printed name

Barton Brimm, PA

Firm name

1500 Highway 17 Business North Suite 214

Number Street

Surfside Beach

City

SC

State

29575-5142

ZIP Code

8032566582

Contact phone

cbrimm@bartonbrimm.com

Email address

SC 6569 / FED 6313

Bar number

SC

State

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

IN RE: )  
 )  
Kismet Rock Hill, ) Case # 21-\_\_\_\_\_  
 )  
\_\_\_\_\_  
Debtor. ) Chapter 11

**STATEMENT REGARDING AUTHORITY TO SIGN AND FILE PETITION**

I, Kartar Singh, declare under penalty of perjury that I am the Manager of Kismet Rock Hill, LLC, and that the following is a true and correct copy of the resolutions adopted by the Members of said company by unanimous consent in lieu of a meeting on the 21<sup>st</sup> day of July, 2021.

Be It Therefore Resolved, that Kartar Singh, Manager of this limited liability company, is authorized and directed to execute and deliver all documents necessary to perfect the filing of a chapter 11 voluntary bankruptcy case on behalf of the corporation; and

Be It Further Resolved, that Kartar Singh, Manager of this limited liability company is authorized and directed to appear in all bankruptcy proceedings on behalf of the company, and to otherwise do and perform all acts and deeds and to execute and deliver all necessary documents on behalf of the company in connection with such bankruptcy case; and

Be It Further Resolved, that Kartar Singh, Manager of this limited liability company, is authorized and directed to employ Christine E. Brimm, attorney and the law firm of Barton Brimm, PA to represent the corporation in such bankruptcy case.

Dated: 07/21/2021

Kartar Singh  
Kartar Singh

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

IN RE: )  
 )  
Kismet Rock Hill, LLC, ) Case # 21-\_\_\_\_\_  
 )  
\_\_\_\_\_  
Debtor. ) Chapter 11

**CORPORATE OWNERSHIP STATEMENT**

Pursuant to Fed. R. Bankr. P. 7001.1, Kismet Rock Hill, LLC discloses that the following entities own 10% or more of any class of the corporation's equity interests:

NONE

Dated: 07/21/2021

KISMET ROCK HILL, LLC

By: Kartar Singh  
Kartar Singh, Manager

**Fill in this information to identify the case:**

Debtor name Kismet Rock Hill, LLC

United States Bankruptcy Court for the: District of South Carolina

Case number (If known): \_\_\_\_\_

☐ Check if this is an amended filing

## Official Form 204

### Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim		
					If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.	Total claim, if partially secured	Deduction for value of collateral or setoff
1	International Hotel Groups 3 Ravinia Drive Atlanta, GA, 30346						63,000.00
2	Guest Supply The SYSCO Company 300 Davidson Avenue Somerset, NJ, 08873						18,000.00
3	TLC Tri-State Laundry Equipment P.O. Box 69 Valdosta, GA, 31603						14,000.00
4							
5							
6							
7							
8							

Debtor Kismet Rock Hill, LLC  
Name

Case number (if known) \_\_\_\_\_

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							



**Fill in this information to identify the case and this filing:**

Debtor Name Kismet Rock Hill, LLC  
United States Bankruptcy Court for the: District of South Carolina  
Case number (If known): \_\_\_\_\_

**Official Form 202**

**Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ Amended Schedule \_\_\_\_\_
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 07/23/2021  
MM / DD / YYYY

**X** /s/ Kartar Singh

Signature of individual signing on behalf of debtor

Kartar Singh

Printed name

Manager

Position or relationship to debtor

United States Bankruptcy Court  
District of South Carolina

In re: Kismet Rock Hill, LLC

Case No.

Chapter 11

Debtor(s)

**Verification of Creditor Matrix**

The above-named Debtor(s) hereby verify that the attached list of creditors is true and correct to the best of their knowledge.

Date: 07/23/2021

/s/ Kartar Singh

Signature of Individual signing on behalf of debtor

Manager

Position or relationship to debtor

Galleria Bar and Grill  
503 Galleria Blvd.  
Rock Hill, SC 29730

Galleria Bar and Grille  
503 Galleria Blvd.  
Rock Hill, SC 29730

Guest Supply  
The SYSCO Company  
300 Davidson Avenue  
Somerset, NJ 08873

International Hotel Groups  
3 Ravinia Drive  
Atlanta, GA 30346

Starwood Mortgage Capital, LLC  
1601 Washington Avenue  
Suite 800  
Miami Beach, FL 33139

TLC Tri-State Laundry Equipment  
P.O. Box 69  
Valdosta, GA 31603

Wells Fargo Bank, National Assoc.  
c/o Alanna Beth Herman, Esq.  
1501 Main Street, Suite 310  
Columbia, SC 29201

# United States Bankruptcy Court

District of South Carolina

In re Kismet Rock Hill, LLC

Case No. \_\_\_\_\_

Debtor

Chapter <sup>11</sup> \_\_\_\_\_

## DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

☐ FLAT FEE

For legal services, I have agreed to accept ..... \$ \_\_\_\_\_

Prior to the filing of this statement I have received. .... \$ \_\_\_\_\_

Balance Due. .... \$ \_\_\_\_\_

☒ RETAINER

For legal services, I have agreed to accept a retainer of ..... \$ 25,000.00

The undersigned shall bill against the retainer at an hourly rate of ..... \$ 350.00

[Or attach firm hourly rate schedule.] Debtor(s) have agreed to pay all Court approved fees and expenses exceeding the amount of the retainer.

2. The source of the compensation paid to me was:

☒ Debtor ☐ Other (specify)

3. The source of compensation to be paid to me is:

☒ Debtor ☐ Other (specify)

4. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

☐ I have agreed to share the above-disclosed compensation with a other person or persons who are not members or associates of my law firm. A copy of the Agreement, together with a list of the names of the people sharing the compensation is attached.

5. In return of the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:

- Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
- Preparation and filing of any petition, schedules, statements of affairs and plan which may be required;
- Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;

d. [Other provisions as needed]  
See Retainer Agreement

6. By agreement with the debtor(s), the above-disclosed fee does not include the following services:  
See Retainer Agreement

CERTIFICATION

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

07/23/2021

/s/ Christine E. Brimm, SC 6569 / FED 6313

*Date*

*Signature of Attorney*

Barton Brimm, PA

*Name of law firm*  
1500 Highway 17 Business North  
Suite 214  
Surfside Beach, SC 29575-5142  
8032566582  
cbrimm@bartonbrimm.com

**ATTACHMENT TO DISCLOSURE OF COMPENSATION OF ATTORNEY FOR  
DEBTOR**

Retainer Amount	\$25,000.00
	<hr/>
	\$25,000.00
Filing Fee	-\$1,738.00
Amount Applied to	
Pre-petition fees & costs (7/23/21)	- \$7,980.00
	<hr/>
RETAINER BALANCE	\$15,282.00

**CHRISTINE E. BRIMM**  
*Certified Specialist in Bankruptcy  
and Debtor-Creditor Law*

**BRIANNA J. MORRISON**  
*Associate Attorney*

**BARBARA GEORGE BARTON**  
*Retired*



**BARTON • BRIMM**

1500 Highway 17 Business North  
Suite 214  
Surfside Beach, SC 29575  
(803) 256-6582  
www.bartonbrimm.com

**Mailing Address**  
P.O. Box 14805  
Myrtle Beach, SC 29587

cbrimm@bartonbrimm.com  
bmorrison@bartonbrimm.com

June 9, 2021

Kismet Rock Hill, LLC  
c/o Katar Singh, Manager  
VIA E-MAIL @ [singh@hirockhill.com](mailto:singh@hirockhill.com)  
and [katar\\_singh@msn.com](mailto:katar_singh@msn.com)

*RE: Agreement for Legal Services*

Dear Mr. Singh:

This confirms the agreement between Kismet Rock Hill, LLC (the "Company" or "You") and Barton Brimm, PA (the "Firm"), pursuant to which the Firm has agreed to represent the Company. Representation pursuant to this agreement expressly does not include any representation of any individual, but only the Company in its corporate capacity. This representation will involve advice and counseling concerning the Company's financial matters as necessary, and may involve the filing of a Chapter 11 bankruptcy. It is understood that any representation by the Firm of any individual or affiliate company will be by separate agreement, and that no such representation is included pursuant to this agreement with the Company.

Representation will commence with payment to the Firm of an initial retainer in the amount of \$5,000.00. The Retainer is for legal services only and does not include the Chapter 11 filing fee of \$1,738.00 to be paid to the Bankruptcy Court, or any additional fees which may arise during the course of the bankruptcy. The Firm may request that the retainer be replenished from time to time, as needed, and You agree to provide such additional retainer amounts as may be requested. The Firm shall send an informational invoice to You including a detailed daily description of its time, charges and reimbursable expenses by the fifteenth (15th) day of each month for services performed and expenses incurred during the preceding calendar month. The Firm shall charge against its Retainer the invoice amount on the date each invoice is sent or, after if a bankruptcy is filed on your behalf, only upon approval by the Bankruptcy Court. Fees shall be charged for the time expended by members of the firm at the rate of \$350.00 per hour for Christine E. Brimm. Time expended on this representation by other attorneys or legal assistants will be charged at the normal and customary hourly rates applicable to each attorney or legal assistant working on these matters as charged by the Firm to its non-bank, corporate and commercial clients. If the Firm increases its hourly rates at any time during the course of this representation, the higher rate shall be deemed substituted for the initial rates described in this agreement.

The expenses chargeable against the retainer may include, among other items, filing fees, deposition expenses, expert witness fees, subpoena and service of process fees, cost of transcripts, document production and reproducing costs, charges for toll, expedited mail or delivery services, fax and telecopier expenses, messenger services, and the cost involved in hiring accountants, actuaries or appraisers if necessary. You agree that, to the extent the retainer is insufficient to pay the amount incurred in fees and expenses, You will pay all additional amounts as incurred.



Kismet Rock Hill, LLC

Page 2

June 9, 2021

You acknowledge that the retainer does not represent a fixed amount for the legal representation, but is instead a security retainer. You will be billed at the hourly rate for all time incurred in this matter. You agree that an additional Retainer amount of not less than \$20,000.00 will be required to be deposited to the Firm's trust account prior to any bankruptcy filing.

You further acknowledge and agree that the Firm has reserved the right to seek approval from the Bankruptcy Court for additional compensation from the debtor's estate beyond the Retainer amounts, or for an enhancement of its compensation at rates higher than those scheduled in this agreement, or in a greater aggregate amount, in the event a bankruptcy is filed.

You agree that You will perform fully and conscientiously all of the statutory duties of the debtor under the Bankruptcy Code, and that You will timely comply with all reasonable requests for information or reports requested by the Firm, by the trustee and by the United States Trustee. These duties include gathering and reviewing all of the information necessary for filing a complete and accurate list of all of Your creditors, by complete name and address, in the form for a matrix required by the Bankruptcy Court, a schedule of Your executory contracts and unexpired leases, the statement of Your financial affairs, and the statement of Your current income and expenses. You acknowledge that bankruptcy forms are required to be completed with the foregoing information, and further acknowledge that to the extent that the Firm has to redraft or assign its personnel to complete these forms for You, the fees for the Firm's services will be substantially increased beyond the retainer amounts.

Representation pursuant to this agreement does not include representation in the following matters, which are hereby expressly excluded. In the event that You desire the Firm to represent You in the following matters, should they arise, a separate written retainer agreement will be necessary.

1. Adversary proceedings;
2. Appeals;
3. Matters involving material facts not disclosed at the time of this Retainer Agreement; and
4. Any other matters or litigation not described herein.

Yours Very Truly,

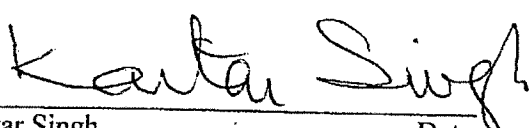
BARTON BRIMM, PA

  
Christine E. Brimm

**RETAINER AGREEMENT AGREED AND ACCEPTED:**

KISMET ROCK HILL, LLC

BARTON BRIMM, PA

  
Katar Singh

Date

7/21/21

  
Christine E. Brimm

Date

7/22/21

Its: Manager